
**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
V.	:	18-CR-97
	:	
ROSS ROGGIO	:	
ROGGIO CONSULTING, LLC	:	

**DEFENDANT'S MOTION EARLY DISCLOSURE OF JENCKS
MATERIAL**

AND NOW, this 14th day of October, 2022, Defendant hereby moves this Court to compel the Government to provide early disclosure of *Jencks* material. Synonymously with this Motion, Defendant is filing a Brief in Support thereof containing the reasons for this request. That Brief is incorporated by reference as if set forth in full herein.

Respectfully Submitted

Comerford Law

Matthew Comerford

Matthew T. Comerford, Esq.

Curt Parkins

Curt M. Parkins, Esq.

Shrive Law

Jason Shrive

Jason A. Shrive, Esq.

Attorneys for Defendant

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CERTIFICATE OF SERVICE

AND NOW, this 14th day of October, 2022, I, Curt M. Parkins, Esq., hereby certify that I served a copy of the foregoing Motion and its supporting Brief upon AUSA Hinkley via ECF.

Curt Parkins

Curt M. Parkins, Esq.

CERTIFICATE OF NON-CONCURRENCE

AND NOW, this 14th day of October, 2022, I, Curt M. Parkins, Esq., hereby certify that I reached out to AUSA Hinkley for concurrence but have not yet received a response.

Curt Parkins

Curt M. Parkins, Esq.

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ORDER

AND NOW, this _____ day of _____ 2022, it is hereby ordered that Defendant's Motion for Early Disclosure of Jencks Material is granted. All Jencks material shall be turned over to defense counsel on or before December 1, 2022.

Mariani, J.